

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OKLAHOMA

1. STATE OF OKLAHOMA, ex rel. )  
W.A. DREW EDMONDSON, in his capacity as )  
ATTORNEY GENERAL OF THE STATE OF )  
OKLAHOMA and OKLAHOMA SECRETARY )  
OF THE ENVIRONMENT C. MILES TOLBERT, )  
in his capacity as the TRUSTEE FOR )  
NATURAL RESOURCES FOR THE )  
STATE OF OKLAHOMA, )

Plaintiffs, )

v. )

05-CV-0329 TCK-SAJ

1. TYSON FOODS, INC., )  
2. TYSON POULTRY, INC., )  
3. TYSON CHICKEN, INC., )  
4. COBB-VANTRESS, INC., )  
5. AVIAGEN, INC., )  
6. CAL-MAINE FOODS, INC., )  
7. CAL-MAINE FARMS, INC., )  
8. CARGILL, INC., )  
9. CARGILL TURKEY PRODUCTION, LLC, )  
10. GEORGE'S, INC., )  
11. GEORGE'S FARMS, INC., )  
12. PETERSON FARMS, INC., )  
13. SIMMONS FOODS, INC., and )  
14. WILLOW BROOK FOODS, INC., )

Defendants. )

CARGILL TURKEY PRODUCTION, LLC, )

Third Party Plaintiff, )

v. )

CITY OF WATTS AND CITY OF TAHLEQUAH, )

Third Party Defendant, )

and )

TYSON FOODS, INC., TYSON POULTRY, )

INC., TYSON CHICKEN, INC.,	)
COBB-VANTRESS, INC., GEORGE’S, INC.,	)
GEORGE’S FARMS, INC., PETERSON FARMS,	)
INC., SIMMONS FOODS, INC., AND	)
WILLOW BROOK FOODS, INC.,	)
	)
Third Party Plaintiffs,	)
	)
v.	)
	)
CITY OF TAHLEQUAH, <i>ET AL.</i> ,	)
	)
Third Party Defendants.	)

**MOTION FOR ADMISSION OF COUNSEL *PRO HAC VICE***

COME NOW the separate Defendants, Cargill, Inc. and Cargill Turkey Production, LLC, by their attorneys Rhodes, Hieronymus, Jones, Tucker & Gable, PLLC, and pursuant to LCvR 83.2(g) and 83.3 move this Court for the admission of Krisann Kleibacker Lee to appear *pro hac vice* in this case as out-of-state counsel for Cargill, Inc. and Cargill Turkey Production, LLC, on the following grounds:

1. The undersigned John H. Tucker is counsel of record for Defendants, Cargill, Inc. and Cargill Turkey Production, LLC, in these proceedings. John H. Tucker will continue to serve as counsel to Defendants, Cargill, Inc. and Cargill Turkey Production, LLC, in these proceedings.
2. Pursuant to LCVR 83.2(g), attached to this Motion as Exhibit 1 is the completed request form of Krisann Kleibacker Lee.
3. Krisann Kleibacker Lee is a member in good standing of the bar of Minnesota. *See* Exhibit 1.
4. The proposed admittee understands that, upon admission *pro hac vice*, she shall be subject to the disciplinary jurisdiction of this Court.

5. The proposed admittee understands that admission *pro hac vice* is for this case only and does not constitute formal admission to the bar of this Court.

6. Submitted simultaneously with the filing of this motion is tender of the required \$75.00 fee to the Clerk of this Court.

WHEREFORE Defendants, Cargill, Inc. and Cargill Turkey Production, LLC, respectfully request that this Court grant this application for out-of-state attorney Krisann Kleibacker Lee to appear *pro hac vice* before this Court on behalf of Defendants, Cargill, Inc. and Cargill Turkey Production, LLC, and enter the proposed Order submitted herewith.

Respectfully submitted,

RHODES, HIERONYMUS, JONES, TUCKER & GABLE, PLLC

BY: s/ John H. Tucker

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ATTORNEYS FOR DEFENDANTS, CARGILL, INC. AND  
CARGILL TURKEY PRODUCTION, LLC

**CERTIFICATE OF SERVICE**

I certify that on the 18<sup>th</sup> day of April 2006, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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I also hereby certify that I served the attached document by United States Postal Service, proper postage paid, on the following who are not registered participants of the ECF System:

Elizabeth C. Ward  
Frederick C. Baker  
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Mount Pleasant, SC 29464

and

William H. Narwold  
Motley Rice LLC  
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Hartford, CT 06103

and

C. Miles Tolbert  
Secretary of the Environment  
State of Oklahoma  
3800 North Classen  
Oklahoma City, OK 73118

s/ John H. Tucker